

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**SCREEN ACTORS GUILD – AMERICAN
FEDERATION OF TELEVISION AND
RADIO ARTISTS, AFL-CIO,**

CIVIL ACTION

No. 2:18-cv-00455-MPK

Plaintiff,

vs.

**SHERIDAN BROADCASTING
NETWORKS, SHERIDAN
BROADCASTING CORPORATION,
RONALD DAVENPORT, JR., and
RONALD DAVENPORT, SR.,**

Defendants.

RESPONSE TO MOTION FOR JUDGMENT ON THE PLEADINGS

AND NOW, come the Defendants, by and through their undersigned counsel, and file the within **RESPONSE TO MOTION FOR JUDGMENT ON THE PLEADINGS**, and in support thereof, state as follows:

1. The averments of this paragraph are admitted.
2. The averments of this paragraph are admitted in part and denied in part. It is admitted that the Plaintiffs filed a Complaint setting forth various claims against the Defendants. The factual and legal averments set forth in that Complaint are denied and strict proof thereof is demanded. It is denied that the Plaintiffs are entitled to Judgment on the Pleadings as to all of the Defendants. The Defendants incorporate the argument set forth in their accompanying Brief, as if set forth herein.
3. The averments of this paragraph are admitted. By way of further

response, the Arbitrator's Opinion and Award are set forth in a written document which speaks for itself. Importantly, the Award is only against Sheridan Broadcasting Networks and no other party.

4. The averments of this paragraph are admitted. By way of further response, the Arbitrator's Opinion and Award are set forth in a written document which speaks for itself. Importantly, the Award is only against Sheridan Broadcasting Networks and no other party. As such, it is improper to suggest that all of the Defendants failed to comply with the Arbitration Award when Sheridan Broadcasting Networks was the only Defendant subject to the Award.

5. The averments of this paragraph are conclusions of law for which no response is required. To the extent a response is required, said averments are denied and strict proof thereof is demanded. By way of further response, the Defendants incorporate the argument set forth in their accompanying Brief, as if set forth herein.

6. The averments of this paragraph are conclusions of law for which no response is required. To the extent a response is required, said averments are denied and strict proof thereof is demanded. By way of further response, the Defendants incorporate the argument set forth in their accompanying Brief, as if set forth herein.

WHEREFORE, it is respectfully requested that the Plaintiff's Motion for Judgment on the Pleadings be denied.

Respectfully Submitted,

Date: March 18, 2019

/s/ David L. Fuchs

ROBERT O LAMPL

PA I.D. #19809

DAVID L. FUCHS

PA I.D. #205694

SY O. LAMPL

PA I.D. #324741

223 Fourth Avenue, 4th Fl.

Pittsburgh, PA 15222

(412) 392-0330 (phone)

(412) 392-0335 (facsimile)

Email: rlampl@lampllaw.com

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CERTIFICATE OF SERVICE

David L. Fuchs, hereby certifies, that on the 18th day of March, 2019, a true and correct copy of the foregoing **RESPONSE TO MOTION FOR JUDGMENT ON THE PLEADINGS** was served upon the following (*via electronic notification*):

Peter H. Demkovitz
Markowitz & Richman
123 South Broad Street, Suite 2020
Philadelphia, PA 19109

Date: March 18, 2019

/s/ David L. Fuchs
ROBERT O LAMPL
PA I.D. #19809
DAVID L. FUCHS
PA I.D. #205694
SY O. LAMPL
PA I.D. #324741
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